

# **Forest Management Public Summary for:**

## **HOOPA TRIBAL FORESTRY**

Certificate Number: SW-FM/COC-068

Date of Certification: April 15, 1999

Date of Public Summary: April 15, 1999, updated December 2000, for 2001

**This document was produced according to the guidelines of the  
Forest Stewardship Council (FSC) and the SmartWood Program.  
No part of the report should be published separately.**

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### **1.0 GENERAL SUMMARY**

#### **1.1 Name and Contact Information**

**Source Name:** Hoopa Valley Reservation

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<sup>1</sup> SmartWood is implemented worldwide by the non-profit members of the SmartWood Network. The Network is coordinated by the Rainforest Alliance, an international non-profit conservation organization. The Rainforest Alliance is the legally registered owner of the SmartWood certification mark and label. All uses of the SmartWood label for promotion must be authorized by SmartWood Network headquarters. SmartWood certification applies to forest management practices only and does not represent endorsement of other product qualities (e.g. financial performance to investors, product function, etc.). SmartWood is accredited by the Forest Stewardship Council (FSC) for the certification of natural forest management, tree plantations, and chain of custody.

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**Owner:** The Hoopa Valley Tribe  
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## **1.2 General Background**

### **A. Type of operation:**

The Hoopa Tribe is a community-based, Tribal forestry operation that manages reservation forestlands for a diverse array of tangible and intangible products, including timber.<sup>2</sup>

### **B. Years in Operation:**

The Hupa People have lived on their land for millennia. Industrial forestry has been occurring since the mid-1940's. The Tribe began exercising self-governance in 1991, at which point they, rather than the Bureau of Indian Affairs, became responsible for forest management operations on reservation lands.

### **C. Date first certified:** April 15, 1999

### **D. Latitude and Longitude:**

Latitude: 41° 00' 00" to 41° 9' 30"  
Longitude: 123° 32' to 123° 45'

## **1.3 Forest and Management System**

### **A. Forest type and land use history**

The Hoopa Valley Indian Reservation located in Humboldt County, California, totals 87,948 acres (including fee land, assignments and allotments). Tribal lands contain an estimated merchantable conifer timber inventory of over one billion board feet (Douglas-fir, grand fir, western hemlock, western red cedar, incense cedar, Port Orford cedar, Shasta red fir, white fir, Jeffrey pine, ponderosa pine, sugar pine, Pacific yew). Although the Hupa people's ancestral homeland was approximately 2½ times greater than this amount, the reservation does represent part of the tribe's traditional lands. Hupa ancestors were not relocated, and have been living in and managing these forestlands for a very long period of time.

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<sup>2</sup> "Hoopa" refers to the Tribe, whereas, "Hupa" refers to the people.

In the early 1990's, the Hupa inherited a forest legacy from the Bureau of Indian Affairs (BIA) based mainly on large-scale clear-cuts. Although the Tribe did not gain control over the management practices conducted on its lands until this time, in sharp contrast to neighboring forestlands, the Hupa have prevented the liquidation of their old-growth forests.

As a result of Hupa prudence, the reservation still includes 35,000 acres of un-logged old-growth forest (mainly comprised of trees from 250-300 years old). The majority of the Hoopa old growth forest is considered sparse (68%); the rest is moderately dense (20%) and dense (12%).

The 35,000 acres of old growth forest represent approximately 40% of total Hoopa lands. Given that old growth forest is the dominant timber resource with which the tribe must work, approximately 21,000 acres (24% of total Hoopa lands) of such forest is targeted for some type of harvest activity. The Hupa have restricted harvest in another 14,000 acres (16% of total Hoopa lands) of the old growth forest in "non-regeneration" areas, or "Restricted Harvest" areas (riparian reserves, cultural sites, inaccessible and erosion hazard zones, Northern Spotted Owl (NSO) and peregrine falcon activity centers, Valley and Bald Hills urban areas, etc.).<sup>3</sup>

Limited harvesting of old growth may occur in some management categories where timber production is not the primary objective (approximately 7,700 acres or 22% of total acreage covered by old growth). Harvesting may include:

- all methods potentially prescribed within wildlife corridors;
- shelterwood with no overstory removal; and
- selective harvests prescribed for mushroom areas, viewsheds, traditional wildlife species activity centers, riparian corridors, Wild and Scenic River corridors, and Priority A, Class 3 and Priority B, Class 2 & 3 Non Domestic Streams.

In addition, mitigation measures designed to help provide some old growth functions are implemented, primarily in the form of reserve trees that are left in modified clear cut, shelterwood, and single tree and group selection cuts. At the end of the 60-year planning period it appears that about 13,900 acres of reserved, totally un-entered old growth will remain, and that roughly 58% of the existing *dense* old growth will remain uncut or partially cut in reserves.

## **B. Size of management unit**

According to the Hoopa Forest Management Plan, excluding fee lands, 86,115 acres are classified as trust reservation lands subject to management activities. Of the 81,019 forested acres, 25,922 (32%) are classified as reserved and not subject to timber harvesting (riparian zones, cultural areas, geologic hazard areas, wildlife habitat and travel corridors, and non-regeneration timberlands). Of the 55,097 acres of unreserved forestlands, 52,943 acres are classified as commercial timberlands and 2,154 acres as non-commercial woodlands.

## **C. Regional context**

Although 3 mills were located on the reservation by the late 1950's, the last mill closed in the early 1980's, and most of the wood goes to mills on the Northern California coast. While the number of bids on any one sale may fluctuate, there are 5 main bidders.

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<sup>3</sup> Acreage figures are being updated to be included as an appendix in the Forest Management Plan for the Reservation (FMP). These figures give a relative view of the situation with the best available data at present.

#### **D. Annual Allowable Cut (AAC)**

The annual allowable cut (AAC) calculated and applied by the BIA management team fluctuated from a high volume of 60 million board feet (MMBF) in the 1966-72 period to an AAC of 13 MMBF in 1989. Since achieving self-governance, the Tribe has dramatically reduced its AAC to the current volume of 10.356 MMBF (conifer) and 3.0 MMBF (hardwood).

#### **E. General description of forest management**

In 1989, the Hupa began to manage their forest resources with trust oversight and federal approval granted by the BIA. Since 1990, the Hupa have exercised the full powers of self-governance as authorized by P.L. 100-472. By early 1991, the Hoopa Forestry Program was run entirely by the Tribe. The Tribe has a Forestry Division within the Natural Resources Department that administers forest management on Tribal lands. The principal contact person for the Hoopa forestry staff is the Tribal Forest Manager (Nolan C. Colegrove). The Forestry Division is complemented by 5 staff members (Supervisor, Planners, Water Quality Coordinator, Environmental Technician) of Tribal Environmental Protection Agency (TEPA).

The Forestry Division includes:

- 1 Forest Manager with 5 Administrative Staff Members,
- Timber Sales Program with 2 professional foresters and 9 technicians,
- Forest Development Program with 3 professional foresters and 3 technicians,
- Forest Management, Inventory and Planning Program with 2 professional foresters and 3 technicians,
- Wildlife Program with 1 professional biologist, 3 permanent and 3 seasonal technicians,
- Tsemeta Tree Nursery staffed with 1 Nursery Horticulturist and 1 technician,
- Roads Sub-Division with 8 staff members, and
- Wildland Fire Sub-Division with 19 employees.

Prior to the late 1940's, proactive timber management was minimal on the Hoopa Reservation; fire control with accompanying road or trail construction was the primary forestry-related activity. Large-scale commercial timber harvesting began in 1947, mainly in the form of extensive, traditional clear-cuts and high grading, under the direction of the Bureau of Indian Affairs (BIA). Early silvicultural efforts on the Hoopa forestlands were traditional for the region. Under BIA jurisdiction, even-aged, large-scale clear-cuts, tractor piling and burning, aerial seeding and synthetic chemicals resulted in many dense, second-growth stands which are poorly stocked with conifers. Roughly half of the original old-growth forest was eliminated by such practices. One of the most difficult tasks for Tribal Forestry today is to rectify problems that resulted from past management. Today, the Hupa are exploring innovative strategies that reflect a major paradigm shift in silviculture. For example:

- The Tribal Council has prohibited artificial chemical control of vegetative competition and invasive exotic species on timber stands; only manual methods may be used.
- Whereas previously there was virtually no consideration of cultural resources (i.e. Port Orford Cedar, or spiritual areas) or special environmental resources (i.e. riparian zones), current planning, timber sale lay-out, and harvesting activities protect such resources.
- The current FMP is the first plan in Tribal history that was publicly reviewed by the affected community.

- Local involvement ultimately reduced the potential cutting areas, and the AAC was also lowered, largely in response to concerns for cultural resources, riparian zones, and wildlife habitat.
- Brush-raking as site preparation has been largely rejected by the Tribe (although not completely eliminated).
- All California State Forest Practice Rules (generally considered the strictest in the nation) are met, and in most cases surpassed in terms of strictness, by the Tribe's self-imposed standards.

Timber harvested on the Hoopa Reservation is sold to an in-house, wholly owned subsidiary of the Tribe, (not a state-chartered corporation) called Hoopa Forest Industries (HFI), which conducts harvesting activities with its own equipment according to plans laid out by Tribal Forestry. HFI places timber sales prepared by the Forestry Division up for bid. HFI has 2 year-round employees (the CEO and Woods Boss), 6 seasonal technicians, and 40-50 seasonal loggers. Due in large part to some dissatisfaction with the profits being obtained by sales to HFI, the Tribe is currently considering alternatives to this in-house timber purchaser, that might generate more revenues.

Due to steep slopes and high rainfall, the logging season for the Hoopa is a short 3-4 month window. As a result of this and other factors, there often exists a backlog of harvests, and the projected AAC is not always met. In 1996, for example, only 6.5 MMBF of timber sales were harvested out of the planned 10.3 MMBF. Despite reduced revenues in 1996 due largely to the inability to harvest the full annual allowable cut, the Hoopa forestry operation is economically viable and a critical pillar of the local economy. The Hoopa produce high value timber, receive a higher stumpage value than others in the region, and maintain an impressive value/cost ratio.

#### **1.4 Environmental and Socioeconomic Context**

Wildlife habitat on the Hoopa Reservation has been modified due to intensive harvesting which began in the mid-1940's. As mentioned previously, about 40% of the Hoopa Reservation have been clear-cut, reducing the area of old growth timber to about 35,000 acres. Roads built for timber harvesting resulted in increased hunter access to big game animals. In some geologically unstable zones, the access roads resulted in landslides and adversely affected stream habitat. To date, the reservation is still composed of very diverse vegetation types and habitats, and no one type dominates the landscape. Logging standards include minimum retention standards for snags, downed wood, and slash piles. Oaks are often protected (particularly in clumps).

Annual revenues from timber activities (minus logging and hauling costs, fees collected for planting, thinning, etc.) were \$7,289,628 in 1995 and \$3,802,408 in 1996. These revenues are used to fund Tribal programs, long-term forest management, and per capita payments to Tribal members. It should be noted that federal funds cover a large portion of the operating costs. Such funds are unreliable; the Federal Base budget for the Hoopa has been decreasing since 1991 in an effort by the federal government to reduce the national deficit and so-called "add-on" funds fluctuate. The result of these belt-tightening actions has been for the Hoopa to leave some staff positions unfilled (primarily environmental specialists) but maintain the general program structure intact.

Tribal forestry programs emphasize social benefits and provide direct employment to more than 20 people of Indian descent, 30-40 additional people who reside on the reservation, and numerous

contractors (most of whom are Tribal members) who do planting and road work. Tribal members receive special preferences for employment in forestry activities. Revenues received by HFI are also indirectly beneficial to the tribe since said company is a Hupa controlled business. The Tribe has contemplated the establishment of an Endowment Fund with forestry revenues, but this objective has yet to be met.

### **1.5 Products**

While the annual allowable cut on the Hoopa Reservation is calculated to be 10.356 MMBF of conifers and 3.0 MMBF of hardwoods, the Tribe has not always harvested this amount. In 1998, the estimated annual production was distributed among species by the following volumes:

Douglas-fir	8.7 MMBF
White fir	0.3 MMBF
Sugar pine	0.2 MMBF
Minor amounts of incense cedar, ponderosa pine, and Shasta red fir	
Hardwoods	1.2 MMBF (tan oak 80% and madrone 20%)

### **1.6 Chain of Custody**

The Tribe does not own or manage any processing facility as part of their operation and therefore would not be required to undergo a separate chain of custody audit. As explained in the present report, the Tribe keeps close track of logs that are harvested and sold to processing facilities in California and Oregon.

## **2.0 THE CERTIFICATION ASSESSMENT PROCESS**

### **2.1 Initial Scoping**

Since 1993, The Hoopa Valley Indian Reservation has been considering the advantages that independent certification of their forestry operations might bring Tribal members. In 1996, the Tribal Council determined that it was in the best interests of the Hupa to explore the concept in detail. After several conversations between Tribal Forestry personnel, the Institute for Sustainable Forestry (ISF) and SmartWood, the decision was made for ISF/SmartWood to conduct a certification scoping of the Hoopa. A scoping, rather than a full assessment, was determined to be the most appropriate first step for the following reasons:

- Relatively recent changes in Hoopa forestry practices were purported to be improvements over past practices, but had not yet been examined on-the-ground by independent reviewers and documentation was minimal.
- While the Hupa's preservation of old-growth was impressive, the cutting of any such forests is a contentious issue in the Pacific Northwest, and needed to be examined prior to determining the appropriateness of going through a full certification assessment.
- The tribe wanted to gain additional information regarding certification and its potential benefits prior.

- ISF/SmartWood wanted to obtain a clearer understanding of the whole situation in order to better plan the assessment team, timeline and budget for a full certification assessment if it were considered the appropriate next step for the Hoopa Valley Tribe.

During the scoping, which occurred in March, 1997, Hoopa staff provided an introduction to key personnel, a general overview of the basic Tribal forestry operations, updates on management changes and future directions, and logistical arrangements to speak with key individuals and visit field sites. The following management units were visited by the three-person scoping team to gain an understanding of management, environmental impacts, logging practices, and Chain-of-Custody:

Hostler S 19	Modified Clear-cut from 1995 (precursor to modified clear-cut)
Hostler J 1	Large, old traditional clear-cut
Hostler U 16	Shelterwood cut (being yarded at time of visit)
Hostler S 18	Thin and release
Big Hill S3-12	Salvage Sale originally cut in 1968, thinned in 1989.
Hostler Q 2	Group selection, Overstory removal from 1990.
Hostler Q 4	Group selection, Overstory removal from 1990.
Soctish G 8	Sanitation cut
Soctish G 9	Modified Clear-cut

## **2.2 Assessment Dates**

The full certification field assessment occurred from July 26-August 1, 1998, at which time the full assessment team was able to evaluate all criteria. On August 12 and 13, Steve Gretzinger and Chris Maser made an additional visit to the Hoopa.

## **2.3 Assessment Team and Peer Review**

A four-person team representing forestry, ecology, wildlife biology, fisheries socio-economics was assembled for the assessment. All members had advanced degrees and extensive experience in Tribal or community forestry. Some had previous knowledge of the Hoopa from professional experiences. Most were familiar with the mixed-conifer forests of the region, and SmartWood certification procedures (see Appendix A for resumes of team members). The team included the following:

- Steve Gretzinger (Forester with the Rogue Institute for Ecology and Economy, Team Leader),
- Frank Hinojosa (University Professor, Stream Survey and Fisheries Consultant),
- Jon Martin (Forester with the BIA, Navajo Tribal Member, Socio-economic considerations),
- Chris Maser (Consultant in Wildlife Ecology, Forestry Ecology, Community Development),

Four anonymous independent peer reviewers representing Native American, forestry, economic, and ecological perspectives also offered comments on the draft report.

## **2.4 Guidelines**

The Hoopa Valley Reservation was assessed based on the ecological, economic and social criteria presented in the ISF/SmartWood Guidelines for Assessing Natural Forest Management. Although a Forest Stewardship Council (FSC) Working Group is drafting certification guidelines

for the Pacific Northwest, they have yet to be formally approved by the FSC. In lieu of these incipient regional guidelines, the assessment team evaluated the Hoopa based on the FSC-approved, ISF/SmartWood guidelines, while also considering the particular context of this property, and including critical components of the FSC draft regional guidelines. The Rogue Institute for Ecology and Economy (RIEE)/SmartWood Oregon guidelines were also utilized to ensure all pertinent issues were adequately covered. A copy of the guidelines used for this assessment may be obtained by contacting SmartWood headquarters in Vermont.

## **2.5 General Process**

The following steps describe the general certification process used by SmartWood to conduct forest certification assessments across the globe. A similar process was followed for Hoopa Valley Reservation.

### ***Step 1. Application***

After reviewing SmartWood program information including the appropriate certification standards, the landowner submits a detailed application to SW.

### ***Step 2. Scoping***

SmartWood staff conducts a preliminary evaluation (scoping) of the property by focusing on major issues, the primary management systems, and available site data.

### ***Step 3. Field Assessment***

A 4-person evaluation team with expertise in forestry, ecology, wildlife biology, economics, social issues and other disciplines is assembled to review field level plans, records, and practices, as well as to interview other parties with knowledge of the (landowners, planning boards, government agencies, environmental groups, etc.).

### ***Step 4. Preparation of the Assessment Report***

The assessment team prepares a draft report recommending scores for each criterion including conditions required to maintain certification into the future. While scores and conditions are discussed by the team as a whole, each individual prepares a section of the final report according to subject area. Written sections are edited for consistency and drafted into a draft document distributed for the team's internal review. Upon the team's approval, the landowner reviews the draft for factual accuracy and to ensure that any preconditions or conditions may be implemented in the stipulated time frame. The report is then subjected to a peer review by impartial, knowledgeable observers.

### ***Step 5. Certification Decision***

A SmartWood certification committee evaluates the assessment report and peer review to make a final decision. Given a positive decision, a contract is prepared to set forth conditions under which the SmartWood label can be used and improvements that must be undertaken during the 5-year certification period. In the case of a negative decision, preconditions necessary for certification are offered.

### ***Step 6. Public Disclosure Statement***

Following the completion of each field assessment and certification decision, SmartWood produces a public summary describing the assessment and findings, but which does not divulge proprietary information of concern to the landowner.



## **2.6 Public Stakeholder Consultation**

Meetings and visits were based upon the team's needs as defined by a review of the FMP and conversations with the Hoopa staff. The target interviewees and sites were the results of stratification designed to ensure an efficient, comprehensive coverage of key issues in a condensed period of time. Additional on-site documents were also reviewed.

In addition to private interviews conducted during the assessment, ISF/SmartWood circulated a public briefing notice via fax, email and hand-delivered copies to local regional and even national stakeholders. A copy of this notice is provided in Appendix A. The list of those in the initial distribution of the public notice is included in Appendix B. A Public Notice was also distributed to general Tribal members as well as Tribal Council members to solicit comments on the Hoopa forestry operations.

The following individuals or organizations were contacted as part of the assessment process and provided input:

### *Hoopa Tribal Forestry*

Elton Baldy, Nursery Horticulturist  
Oscar Billings, Timber Sale Layout  
Greg Blomstrom, Forest Planner  
Nolan Colegrove, Forest Manager

John Horne, Forestry Technician  
Ron Lawton, Silviculturist  
Robert Marshall, Scaling Technician/Small Sales Officer  
Todd Salberg, Assistant Silviculturist  
Debra Starkey, Administrative Assistant  
Bill Wilkinson, Timber Management Officer

### *Hoopa Forest Industries*

Robert Blanchard, Chief Executive Officer  
Bryan Colegrove, Sr. Woods Boss  
Julie Robertson, Administration

### *Hoopa Wildlife Department*

Billie Colegrove, Wildlife Technician  
Mark Higley, Wildlife Biologist

### *Hoopa Tribal Council*

Maggie Dixon, Tribal Council Delegate  
Merv George, Jr. Chairman  
Jasper Hostler, Tribal Council Delegate  
Alfred Kane, Tribal Council Delegate  
Joseph E. LeMieux, Tribal Council Delegate

### *Hoopa Tribal Members*

David Hostler, Tribal Museum Curator, Cultural Committee Member  
Danny Jordan, Self-governance Coordinator  
Lincoln Jackson, Cultural Committee Member, Tribal Real Estate Officer  
Pliney McCovey

*Interested Third Parties*

Karen Theis, Private Consulting Botanist  
Bill Barclay, Greenpeace  
Tracy Katelman, ForEverGreen Forestry, Consulting Forester/Environmental  
John Larsons, USFS  
Patrick Shannon, Chairman, New River Timber Company, Inc.

*Hoopa Tribal Fisheries*

James Wroble, Senior Biologist  
Mike Orcutt, Director  
George Kautsky, Deputy Director/Fish Biologist  
Robert Franklin, Hydrologist  
Dick Laven, Hydrologist  
Mike McConnell, Technician and Yurok Tribal Member

*Yurok Tribal Forestry*

Ronnie Reed, Forester  
Bill Peterson, Assistant Forester  
Walt Lara, Forester field Coordinator/Cultural Advisor  
Roland Raymond, Forester

The assessment team visited the following units to ensure that a range of sites reflecting different forest types, history, silvicultural prescriptions and environmental conditions were evaluated:

Hostler U-16  
Hostler U-26  
Supply Creek K-14  
Pine Creek M (Stands: 1, 2, 4, 8, 31)  
Bull Creek Q-39  
Hostler W-2 (Long Ridge)  
Hostler W-40  
Hostler W-6  
Hostler W-4  
Hostler W-3

Individual team members traveling alone or with members of the Tribe visited other sites both on and off the Hoopa in order to engage in private conversations, place the Tribe's activities in the proper regional context, and cover additional issues that did not necessarily need to be covered by the whole team.

## 2.7 Scoring

On July 28 and July 30, the team held an internal meeting to discuss initial findings, and propose scores and conditions by subject areas for the final analysis. Each member was responsible for ensuring subject areas related to his area of expertise were adequately addressed. Based on the content and analysis of each criterion, a score was assigned for each criterion using the following guide, and during peer review, the scores were commented upon for accuracy and consistency:

### SmartWood Guide to Scoring, Performance Level and Compliance for Forest Certification Assessments

SCORE	PERFORMANCE (General Description)	COMPLIANCE Pre-Conditions, Conditions & Recommendations
N/A	Not an applicable criterion	Not applicable, thus no pre-conditions, conditions or recommendations; criterion not used for score averaging.
1	Extremely weak performance; strongly unfavorable; or data lacking	Pre-conditions required.
2	Weak performance; improvement needed	Pre-conditions optional; conditions required.
3	Satisfactory performance	Conditions and recommendations optional.
4	Favorable performance	Recommendations (non-mandated actions) optional.
5	Clearly outstanding performance	---

SmartWood definitions of pre-conditions, conditions and recommendations are as follows:

- **Pre-conditions** are requirements that candidate operations must agree to and address to the satisfaction of SmartWood before certification status may be obtained.
- **Conditions** are requirements that candidate operations must agree to that will form part of the certification agreement. These conditions will be expected to be fulfilled within an agreed upon time period during the five-year certification contract period. Non-compliance with conditions may lead to de-certification
- **Recommendations** are non-binding, voluntary actions suggested by assessment teams that are not required.

### **3.0 RESULTS AND CONCLUSIONS**

#### **3.1 General Discussion of Findings**

##### *Socioeconomic Issues*

The Hoopa forestry program is an outstanding example of a community-based forest management system that actively strives to include public input in all phases of planning and implementation. A major factor for this is that all operations occur on Tribal lands for which there is a traditional history of Tribal member involvement. Despite the presence of non-Indian residents and professionals, the Hupa remain a group with similar cultural beliefs and backgrounds. They appear to have relied on democratic principles and look at their self-governance as a way to address community and economic needs. The self-governance path selected by the Tribe has meant that they must assume responsibility for the design and delivery of trust programs originally administered by the BIA and other federal agencies. Such a choice has fostered an impressive development in organizational, administration and operational skills. The Hoopa Forest Management Plan (FMP) is largely a Tribal product and reflects this organizational maturity.

Hoopa residents have been actively involved in forest management. Individual and group concerns have resulted in positive changes in harvesting activities. Law enforcement protects the rights of the greater Hupa community. Numerous Tribal members and local residents are directly or indirectly employed by Tribal Forestry, Hoopa Forest Industries, or as contractors. Interestingly enough, this strong economic link to forestry does not seem to have resulted in a situation where the entire community is pro-maximum timber production. While timber revenues do drive the program in part, the Cultural Committee, TEPA, the Fisheries Department and other special interests, constantly strive to ensure a well-balanced approach to forest management.

The Hupa seem to have good working relationships with neighboring landowners, primarily the U.S. Forest Service. The Forest Service regularly consults the Council on projects related to their aboriginal territory, and they have collaborated on timber harvesting, fire management and restoration work in the past. The Long Ridge Cultural Area was cited as one example of such cooperation.

The Tribal Forestry Division has been established to promote forest management rather than simply timber harvest. The Hoopa Forest Management Plan explicitly states that the conservation and development of forest resources will be for the present and future benefit of the Tribe. This goal has resulted in the funding of the Forestry Division, training and development, safe and secure transportation, health and life insurance benefits, scholarships in natural resource-related disciplines, and per capita payments to Tribal members. Approximately 100 people are employed in full or part-time activities related to the forestry operation. Unfortunately, the Tribal Council had expected to establish an Endowment Fund, which is one reason why harvest scheduling was modeled to maximize the return in the first period. This fund has not yet been officially adopted nor realized.

The Tribe maintains logging and management costs at a reasonable level and appears to be adequately managed from a financial perspective. Critics of Hoopa Forest Industries are currently advocating that this Tribally owned subsidiary be disbanded in favor of open-market bids and/or enveloped within Tribal Forestry. These Tribal members feel that maximum revenue generation is paramount to the social value of HFI (i.e. providing jobs to Hoopa residents). In the past however, open-market bids have shown HFI to be competitive in terms of costs. The larger

and more pertinent issues may revolve around improved administration and communication at HFI.

There are restrictions on the use of some federal funds received by the Tribe. A Congressionally mandated reduction in such funds is always a possibility with federal monies, and potentially poses limitations in the future. Regardless, the Hoopa forestry operation appears economically viable and is certainly a critical brace for the local economy. The Hupa produce high value timber, receive high stumpage, and have an impressive value/cost ratio.

As a final point, it should be noted that there is a constant call for more profits and per capita payments for Tribal members by some members of the community. Reduced profits and per capita payments (due largely to depressed timber prices around the Pacific Northwest) are often blamed on HFI and cited as a reason to change the management approach or personnel. One of the Tribe's goals in pursuing SmartWood certification is to obtain market recognition for its exemplary forest management (i.e. higher stumpage). Increased profits due to certification would go a long way in calming the economic discomforts created by the recent, relatively poor markets for the Tribe's logs.

### *Forestry Issues*

One must recognize that there are no operational examples of the type of silviculture being practiced by the Hupa on their traditional lands in the region. The Hupa are pioneering a progressive silvicultural approach that has little precedence in the literature, and little site-specific data. In short, the Tribe is breaking new ground and taking a risk to do something unprecedented for old-growth forests in the Pacific Northwest.

To put the current approach into context, one must consider that early silvicultural efforts on the Hoopa Reservation were traditional for the region. Under BIA jurisdiction, even-aged, large-scale clear-cuts (often in excess of 100 acres) were the dominant practice, followed by tractor piling and burning to effectively eliminate logging slash. Reforestation was marginally successful. Synthetic chemicals were frequently used to eliminate competing vegetation. This approach often resulted in dense, poorly stocked, logged stands. Roughly half of the original old-growth forest on the Hoopa Reservation was converted by such practices. Conflicts with the BIA over management direction were common, largely due to the lack of Tribal involvement in planning efforts.

Over the course of the last decade, the Hupa have made substantial changes from conventional silvicultural practices to modern techniques that are more environmentally sensitive and ecologically justifiable. To help rectify past mistakes, promote long-term forest production, and respond to environmental concerns, the Hupa are exploring innovative strategies that reflect a major paradigm shift in silviculture.

The Hoopa Forest Management Plan (FMP) is comprehensive, easily readable, and generally internally consistent, although there are sections that are currently not being implemented and/or have been changed or only partially implemented. Substantial public input was solicited to define the appropriate management direction for the plan (to the degree of producing a video that presented the different options to interested parties). Resource data and descriptions, (also found in the Timber Inventory Analysis) are accurate and complete. Management actions, Federal and Tribal minimum management requirements, and Tribal standards and guidelines are described in detail. Long term sustained yield and annual allowable cut projections are made using a 120-year planning horizon and a vision of forest conditions in 50 years is described.

The Hupa have made an outstanding effort to establish an AAC based on conservative and well-documented estimates of growth and yield to ensure that rate of harvest does not exceed sustainable levels. According to Timber Inventory Analysis (TIA) projections, the Hoopa could maintain a Long-Term Sustained Yield (LTSY) ranging from 9-27 MMBF. The chosen AAC of 10.356 MMBF (conifers) and 3.0 MMBF (hardwoods) is at the lower end of this range and reflects the Hupa's decision to:

- not sacrifice long-term timber potential for short-term harvests, and
- invest revenues to increase growth of managed stands.

Continuous timber inventory data is updated every 10 years, and adjustments to the Allowable Annual Cut (AAC) of up to 10-15% can be made on the basis of these re-measurements. The CFI system is designed to provide estimates of total volume, defect, and other characteristics of old growth stands. This system is less appropriate for portraying stocking conditions on stands dominated by 1-30+ year old regeneration, and therefore may not accurately estimate growth and yield for young, regenerated stands.

A monitoring process is included in the FMP, and more importantly, implemented by Tribal Forestry. This process requires interdisciplinary team monitoring of projects, silvicultural and burn plan prescriptions, road construction, officer's reports, sale contracts, log scaling, cumulative effects, etc. An annual monitoring report is required to be submitted to the Tribal Council detailing at least some of the above information.

Although trees harvested in subsequent rotations will not produce lumber with the tight grain, knot free qualities, and strength of old growth, they will produce either grade 2 or 3 mill logs. Without investments in second growth stands, the log mix will change from predominately large and medium sawlogs to small logs. If markets do not allow for the orderly harvesting of hardwoods, there may be problems implementing silvicultural prescriptions and thus meeting the long term sustainable yield goals outlined in the FMP. Another issue is bear damage, which is affecting growth and yield on many units.

While not contemplated in the plan, the Hupa have influenced management activities on U.S. Forest Service lands contiguous to the reservation, and are expanding the planning scope to other areas. The Hupa have also collaborated on a regular basis with the U.S. Forest Service on fire suppression efforts in both federal and Tribal lands. The Tribe has shown its commitment to watershed rehabilitation through involvement in the Klamath River Basin Conservation Area Restoration Program and the Trinity River Basin Fish and Wildlife Restoration Program and its adoption of the water quality standards outlined in the Water Quality Control Plan for the North Coast Region.

The FMP clearly states that no large-scale intensive clear-cutting is allowed. In recognition of the significant environmental problems caused by past large-scale and inappropriately designed clear-cuts, the Hupa have designed a lower impact treatment termed "modified clear-cut". The major distinguishing characteristics of the Hoopa modified clear-cut is that it may not exceed 10 acres in size and requires retention of snag, legacy and hardwood trees. From an ecological perspective, as practiced on the ground, this silvicultural approach is a substantial improvement over the dominant even-aged paradigm common in the region.

The modified clear-cut is not the only silvicultural approach utilized by the Hupa, and in fact, represents only about 50% of the treatments implemented on-the-ground. The Hupa do not utilize a blanket "one size fits all" silvicultural prescription. To the contrary, staff members strive to balance environmental and economic considerations to ensure that the proposed prescription is

appropriate for the particular stand. Staff members rely heavily on local knowledge; they know the area well and consult with one another (and during the IDT process). Good supervision exists to make sure that difficult stands receive a thorough review.

Treatment design is site-specific and flexible enough to accommodate natural variables (leaving and protecting clumps of hardwoods and wildlife trees within the unit, for example). Populations of some plants harvested for traditional uses have been mapped and are also protected during logging operations. Reforestation of cut areas is standard. Natural regeneration is not relied upon since understocking on BIA-harvested areas is a concern and the Tribe must obtain maximum stocking in a short period. Harvesting is not based on diameter limits or high-grading, and thinning regimes are proposed.

The current forest landscape is extremely diverse and varied. Cutting units are distributed so that a mosaic of patches (ranging from < 1 acre to  $\leq 10$  acres) intermixed with no-cut preserves will dominate the landscape. This non-contiguous layout of units, in conjunction with old-growth buffers (along watercourses and in special protected areas), protected clumps, and residual trees (some of which could be cut in the future), will help contribute to a multi aged, multi species forest *landscape*.

The tribe has established a cultural burning program that has helped resolve the perception that cultural burning is arson. Tribal members may receive maps from Tribal Forestry to identify areas where bear grass and hazel-stick may be picked after these plants regenerate after burns.

### *Ecological Issues*

It is extremely impressive to note that the Hoopa Tribal Council has passed resolutions (81-80, 81-90, 81-91, 81-93) prohibiting the use of pesticides on the reservation. Herbicide use and spraying is prohibited. The Tribal Council must be notified of plans for application of hazardous chemicals and pesticides by private landowners on or near the reservation. Indian Health Services was required to release information on the effects of pesticides to Tribal members, and conduct a study of such effects on humans, wildlife, fish, food sources, and basket materials.

The Tribe also officially opposes the use of herbicides in the Klamath-Trinity watershed, has requested direct notification from the Forest Service regarding any proposals to use herbicides in the watershed, and has authorized the administrative appeal of any such decisions to use herbicides. Tribal methods for the control of pests and pathogens in the forest stands are exceptional, and the Hupa should be commended for taking such a progressive stance against chemical use within the reservation.

Another positive aspect of the Hupa forest management approach is their restraint. The Tribe has established many protected areas where harvest will be restricted, including traditional ceremony sites, the DeNoTo Trail, South Tish Tang Reserve, Sockish Redwood Grove, Port Orford Cedar Reserve, Peregrine Core Area, Wild and Scenic River, Valley Viewshed, Trinity/Klamath gorge viewshed, riparian zones, and traditional species activity centers.

Although the number of acres in the reserve system is impressive, a pertinent concern revolves around the change in forest structure that will result from the creation of a mosaic of relatively even-aged patches (albeit of different ages, composition and structure) distributed throughout the commercial forestlands. Simply put, over a 60-year period or so, the Hupa will convert old growth to younger stands on forest allocated to intensive timber management outside of reserve

areas (roughly 21,000 acres). The degree of concern surrounding this potential problem is somewhat lessened by the fact that:

- other previously cut areas (currently dominated by degraded or secondary forest) have been allocated to special reserve status for a variety of reasons, and will remain uncut to grow into old-growth;
- substantial old growth reserves have been established;
- individual trees (snags, legacy trees) are left within cutting areas to provide structural elements;
- not all units are subject to patch-cuts; other silvicultural approaches (principally thinning, individual tree selection, shelterwood with no overstory removal) are used as well and will provide structural diversity.

The Hupa are not faulted for cutting old-growth forest because they have no social or economic options; the question is where, and why one particular stand is cut as opposed to another stand and how. For the purposes of SmartWood certification, the issue of adequacy relates more to the distribution and location (where and why) than to the simple fact that old-growth forest is being cut. This is an important point because the Reservation's ecological integrity (dependent to a large degree on the degree to which old-growth functions are maintained) depends to a certain extent, upon the maintenance and restoration of traditional landscape patterns. According to maps (depicting old-growth forests as of 1998, remaining old-growth forest in 50 years, and old-growth that will exist when all no-cut areas have regrown), the Hupa could produce a superb network of old-growth, mixed-species forests as the basis of the landscape pattern, while also producing valuable timber and supporting the local economy.

Although the Hoopa forest is being replanted with a mix of species produced at the Tribal Nursery (and a smaller amount of natural regeneration), the long-term trend would be to somewhat change relative species dominance and composition in the harvested areas. On a stand-level, this change could be great, but from a landscape perspective, the change in species composition would not be large.

The Tribe is managing to avoid direct take of T & E species found on the Hoopa (bald eagle, northern spotted owl, peregrine falcon) as required by law. Over 1700 survey visits have been and continue to be done for marbled murrelet, with no evidence of their occupancy on the Hoopa. The Tribe has developed and submitted to the USFWS a "Biological Assessment of the FMP", which is a 10-year plan to protect T & E species.

Surveying has been done for "Category 2" species (no longer a USFWS category), especially for fishers which are considered a "traditional" species. Management actions have not been specifically designed to protect Category 2 species, other than for those that also happen to be traditionally important species. Traditional species have designated reserves in which management intensity is restricted to shelterwood NOR, selection, or sanitation/salvage. The primary goal in regard to traditional species is to reduce the chance of damaging critical habitat, such as that required for nesting, roosting, or denning.

Upland dispersal/travel corridors (outside of reserves) have been designated to address USFWS concerns about dispersal routes for NSO through the Hoopa from the Late Successional Reserves (LSR's) to the east and Redwood Creek to the west. These corridors were designated where there were existing old growth/mature stands, not always in their optimum locations. All management intensities were designated for these corridors, which may reduce their value for the stated purpose if modified clear-cutting is done over a substantial portion of them.



The FMP has identified a decline in deer and elk populations due to logging. Unrestricted hunting may also be a factor in this decline. The Tribe will attempt to provide hiding and thermal cover for these species on all lands, but at a minimum will maintain this cover on wildlife lands. Timber management practices will be modified to meet this goal.

The permanent road system on the Hoopa Reservation appears to be in fair condition with a great deal of effort being placed on maintenance. Although some of the past road locations do not comply with current standards, there is an effort to decommission some of these roads. New roads are planned with rolling dips and outslopes which are less likely to fail during heavy storm events. New culverts were observed and according to staff were part of a program to up-size for a 50-year storm. Winter operations are conducted on rocked roads only. Observed stream crossings were in good condition, and had energy dissipation (rocks, slash) placed at the outfall in order to minimize erosion of fill slopes. It is quite encouraging to note that the Tribe employs its own water quality specialists and hydrologists. There is a plan underway to install permanent monitoring stations.

In general, the management standards described in the FMP are more stringent than the California Forest Practices code. Stream protection standards are designed to protect in-stream and near-stream habitat, as well as function as filter strips to protect overall water quality. Tiered buffer widths depending upon stream class and slope angle appear to be sufficient to protect public trust values, such as water quality, while providing wildlife corridors and late seral connectivity to the landscape. Observed riparian buffers in areas harvested in the recent past were of good quality and adhere to certification standards.

### 3.2 Summary of Scores by Subject Area

Subject Area	Average Score
1.0 Commitment to FSC Principles and Legal Requirements	5.0
2.0 Land Tenure and Use rights and Responsibilities	4.2
3.0 Forest Management Planning	4.4
4.0 Forest Management Practices	3.5
5.0 Environmental Impacts and Biological Conservation	4.0
6.0 Community and Worker Relations	4.3
7.0 Benefits from the Forest and Economic Viability	3.8
8.0 Chain of Custody in the Forest	5.0
9.0 Indigenous Land Ownerships	4.6

### 3.3 Certification Decision

Based on the initial scoping visit, the full assessment visit, interviews with outside parties, and an analysis of related documents, it is clear that the forest management philosophy practiced by the Hoopa Tribe on their forest lands is compatible with Forest Stewardship Council (FSC) Principles and Criteria for forest certification.

After review of the certification assessment team recommendations, peer reviews, and consultation with outside parties, SmartWood headquarters approves the certification of the Hoopa Valley Reservation as a "well-managed" SmartWood source.

### 3.4 Conditions

The Hoopa Valley Tribal Council must address the following conditions over the course of their 5-year contract period to maintain SmartWood certification status:

1. Throughout the certification period, Tribal Forestry must ensure that all members of the Hoopa interdisciplinary (ID) team are notified in writing, preferably two weeks in advance, of upcoming termination of logging operations or removal of equipment on a particular unit. (Criterion 4.4)
2. Throughout the certification period, Tribal Forestry shall provide copies of the silvicultural prescription to all field staff prior to commencement of on-the-ground operations to ensure they understand the prescription and contract stipulations. The Woods Boss must communicate any misunderstanding to the Timber Sale Administrator prior to initiating logging activities. (Criterion 4.6)
3. Throughout the certification period, the FSC approved registration code assigned by SmartWood must be included in all sales and shipment documentation related to certified sales. (Criterion 8.2)
4. By the end of Year 1, Tribal Forestry shall summarize the following results from data collected from CFI plots in 1996 on a per acre basis by forest strata, and adjust the Annual Allocable Cut (AAC) and/or harvest schedules as necessary:
  - Mean gross and net conifer/hardwood volumes and basal areas;
  - Inventory statistics (# of plots, Standard Error); and
  - Growth and mortality. (Criterion 4.3)
5. By the end of Year 1, Hoopa Valley Tribe shall conduct an educational workshop in the field with silviculturists, wildlife biologists, Tribal Council members and HFI employees to explain the reasons for specific management objectives, silvicultural prescriptions, and marking guidelines. (Criterion 4.19)
6. By the end of Year 1, Hoopa Valley Tribe shall include provisions in standard logging contracts that stipulate fines or disincentives for:
  - unjustified damage to a designated leave tree as determined by Timber Sale Administrator;
  - landing and yarding corridor deviations that have not been approved by the Timber Sale Administrator and are not in accordance with contract specifications; and
  - lack of compliance with the written policy prohibiting logging under wet conditions. (Criteria 4.6 and 4.24)
7. By the end of Year 1, the cumulative effects from individual sales must be analyzed within the context of the watershed within which the sale is found, and specific mitigation actions must be designed and implemented to reduce the negative cumulative impacts from unavoidable actions associated with chosen alternatives. (Criterion 5.2)
8. By the end of Year 1, Hoopa Valley Tribe shall initiate a program to educate Tribal members about the ecological value and necessity of the leave trees, and utilize signs or other marking options to reduce the likelihood of theft of the leave trees for firewood. (Criterion 5.21)

9. By the end of Year 2, Hoopa Valley Tribe shall establish and follow a written policy in relation to cutting (or no cutting), salvage, or entrance with machinery, for approved special management or riparian protection zones. (Criterion 4.20)

10. By the end of Year 3, based upon analysis of results from the research project on bear damage and analysis of CFI data, Hoopa Valley Tribe shall:

- establish a plan to address the bear problem and treatment of young stands (including priorities, schedule and funding),
- obtain Tribal Council approval, and,
- and begin implementing plan. (Criterion 4.8)

11. By the end of Year 3, relevant Tribal Departments (Tribal Forestry, HFI, Roads Department, Cultural Committee, etc.) must establish a schedule or prioritization for the obstruction of access, the “putting to bed” and decommissioning of logging roads to reduce access-related problems, high maintenance costs and environmental problems. (Criterion 4.17)

12. By the end of Year 3, Hoopa Valley Tribe shall prepare and begin implementing a long-term habitat restoration plan for critical species designed to accomplish explicit objectives by the end of the Tribe’s 50-year vision period. This plan must include the following components:

- maps that show visible progress over time;
- habitat corridors that link U.S. Forest Service lands to Tish Tang Reserve, De No To Trail, the National Park Service Redwood Park with Hoopa lands (not necessarily no-cut areas);
- identification and protection of critical endangered or threatened resources (e.g. endemics, fragile aquatic areas, etc.); and,
- specific silvicultural prescriptions to facilitate habitat development in the corridors. (Criterion 5.6)

13. By the end of Year 3, Hoopa Valley Tribe shall utilize maps and aerial photographs of pre-BIA cutting to determine the historical landscape pattern (pre 1950’s) based on forest types or plant communities (as a function of soil, topography, precipitation, etc.). (Criterion 5.7)

14. By the end of Year 5, Hoopa Valley Tribe shall develop and implement a monitoring system for young, regenerated stands (< 30 years) to:

- accurately determine the stocking levels, growth and yield of untreated and treated areas,
- monitor the response of young stands to pre-commercial thinning and release, and
- make adjustments to the AAC and/or harvest schedules as necessary. (Criteria 4.3)

15. By the end of Year 5, Hoopa Valley Tribe shall analyze continuous forest inventory (CFI) plot data by treatment (i.e. silvicultural prescription) to evaluate the effectiveness of treatments on tree growth, and incorporating observations on brush competition, coarse woody debris, and wildlife habitat, in order to make modifications in prescriptions as warranted. (Criterion 4.4)

16. By the end of Year 5, Hoopa Valley Tribe shall develop and implement a monitoring system for young, regenerated stands (< 30 years) to:

- accurately determine the stocking levels, growth and yield of untreated and treated areas,
- monitor the response of young stands to pre-commercial thinning and release, and
- make adjustments to the AAC and/or harvest schedules as necessary. (Criterion 4.3)

17. By the end of Year 5, Hoopa Valley Tribe shall design silvicultural prescriptions, harvest scheduling and timber sales to work toward the establishment of historical (pre-1950's) patterns on the managed landscape by the end of the first 50-year vision period. (Criterion 5.7)

## APPENDIX A:

# Public Briefing Paper for SmartWood Forest Management Certification Assessment of The Hoopa Valley Indian Reservation

July 1998

### Introduction

The SmartWood Program of the Rainforest Alliance is conducting a forest management certification assessment of The Hoopa Tribe's Forest Management Plan in Hoopa, California.

### Scope of the Certification Assessment

The forest management certification assessment will assess the environmental, silvicultural and socioeconomic aspects of the tribally managed forestry operations on The Hoopa Valley Indian Reservation, using the 1998 ISF/SmartWood "Guidelines for Assessing Natural Forest Management" with modifications for Native American forestry operations. To obtain a copy of these guidelines, please contact SmartWood by telephone, FAX or email listed below. The Forest Stewardship Council (FSC) accredits SmartWood and the Hoopa assessment process follows procedures approved by the FSC.

**Assessment Team Composition** – The assessment team will be led by an MS level forester with extensive community forestry experience who has led SmartWood certification assessments in the U.S. and Latin America (including indigenous operations). A widely published PhD level ecologist with extensive experience in wildlife biology, old growth forests and indigenous resource management is also participating on the team. A Native American with MS level background in tribal forest management planning assess socioeconomic and community issues. An MS level fisheries biologist and university professor with extensive watershed, riparian, and indigenous resource management experience will also be on the team.

**Assessment Steps and Schedule** – Following is a short description of the certification process and a tentative agenda:

- ◆ Assessment organization – The SmartWood team will conduct interviews and review available information before departing to field sites for assessment work.
- ◆ Field assessments – The team will visit sites on The Hoopa Valley Indian Reservation.
- ◆ Final assessment briefing at Hoopa – Prior to departure, the team will meet with members of Hoopa Tribal Forestry to finalize their data collection. They will not present the final conclusions of the assessment at this time; those conclusions will come after the report production process.
- ◆ Draft report production – The assessment team will produce a confidential draft report that will be circulated for comment to The Hoopa Valley Tribal Council and a minimum of two independent peer reviewers.
- ◆ Certification decision – Upon receipt of comments on the draft report from The Hoopa Valley Tribe and independent peer reviewers, SmartWood headquarters will reach a certification decision.

**Public Comment**

We welcome input (either public or confidential) on the Hoopa forest management operations at any stage of the assessment process. We must, however, receive comments prior to August 14, 1998, to take them into consideration in reaching a certification decision. Please submit all comments in writing by post, FAX or email to SmartWood Headquarters in Vermont. Unless you request otherwise, these comments will be kept confidential and are solely for the purposes of assessing The Hoopa Valley Tribe's Forest Management Plan.

**Contacting SmartWood** – You may contact SmartWood in any of the following ways. We suggest you direct your communications to Jon Jickling or John Landis.

- ◆ Email – <jickling@smartwood.org> or <jlandis@smartwood.org>
- ◆ Telephone – 802-434-5491
- ◆ FAX – 802-434-3116

Mail address – SmartWood Program, Goodwin Baker Building, 61 Millet Street, Richmond, Vermont USA 05477

## **APPENDIX B: Hoopa Public Announcement Briefing Paper Distribution List**

The following list only represents the initial distribution of the Hoopa Public Announcement Briefing Paper. In each case every individual it was sent to was asked to distribute it further.

### **Via Email:**

tkatelman@igc.apc.org (Tracy Katelman)  
nec@igc.apc.org (Northcoast Environmental Center)  
wsc@tcoe.trinity.k12.ca.us (Trinity Watershed Center)  
klamath@sisqtel.net (Klamath Forest Alliance)  
pft@pacific.net (Pacific Forest Trust)  
Cecilia@nature.berkeley.edu  
bbarclay@sfo.greenpeace.org (Bill Barclay)  
woodrat@igc.apc.org (Fred Euphrat)  
klamgis@cris.com (Yvonne Everett)  
art@harwoodp.com (Art Harwood)  
rainwood@ran.org (Chris Hatch)  
rhrubes@igc.apc.org (Robert Hrubes)  
nickie@leland.stanford.edu (Nickie Irvine)  
ecofo@mindspring.com (Gordon Smith)  
richrok@mind.net (Richard Hart)  
fscus@together.net (Jamie Ervin and Alan Pierce)  
headwatr@penn.com (Eric Carlson)  
isf@igc.apc.org (Walter Smith)  
Larry@opf.tscnet.com (Larry Nussbaum)  
sgretz@mind.net (Steve Gretzinger)  
kbro@wheeler.northland.edu (Kim Bro)  
jickling@smartwood.org (Jon Jickling)  
kbeyer@smartwood.org (Kathy Beyer)  
palola@nwf.org (Eric Palola)  
calfee@nwf.org (Alan Calfee)  
tcater@ra.org (Todd Cater)  
rzd@smartwood.org (Richard Donovan)  
wjhall@smartwood.org (Wendy Hall)  
dwparks@smartwood.org (Dawn Parks)  
hunt@nwf.org (Jean Hunt)  
aweld@smartwood.org (Ashley Weld)  
rbran@win.bright.net (Bob Brander)  
jsector@mind.net (Jordan Sector)  
mobrien@smartwood.org (Minga OBrien)

### **Via Fax:**

Bill Wilkinson (Hoopa Tribal Forestry)  
Roland Raymond (Yurok Tribe)  
Brian Rukger (Tule River)  
Harold Trip (Karuk Tribe)  
Skip Thompson (Round Valley)  
Jaime A. Pinkham (Intertribal Timber Council)

## **SmartWood Certification Annual Addendum to the Public Summary For Hoopa Valley Tribe, 2000**

### **Dates of Audit and Sites Visited**

The on-site audit was conducted August 28 and 29, 2000. Sites visited on the forest included:

- Hoopa Tribal Forestry office.

- A view of a fire line and results of a wildfire that started on U.S. Forest Service lands and then moved onto Hoopa land.
- Hostler Ridge road to view next years thinning project in the viewshed of Hoopa.
- Seven recent harvest units in the Mill Creek area
- Bear damage sites
- Approximately 20 miles of road were traversed.

#### **Auditors**

Walter Smith, Western Regional Manager. Mr. Smith has twenty-seven years experience in the forest products industry, the last ten in forest products certification within the SmartWood Network. He is a founding member of the Forest Stewardship Council.

Yana Valachovic, Institute for Sustainable Forestry Certification Director. She holds a M.S. in Forest Ecology from Oregon State University. She has worked with the USFS Pacific Northwest Research Station, the Bureau of Land Management and as a faculty research assistant for Oregon State University. Her specialties include soils, botany and mycology.

#### **Personnel Interviewed and Documents Reviewed**

On-site interviews conducted with Hoopa Tribal Forestry (HTF) staff included Nolan Colgrove, Forest Manager, Greg Blomstrom, Forest Planner, Todd Salberg, Silviculturalist and Mark Higley, Wildlife Biologist.

#### **Documents reviewed for this audit include:**

- Block Closure notice
- Basal area summary of cut units
- Contract Clauses-
- Approved minor amendments to FMP
- Draft Inventory Analysis
- Silviculture review of individual cutblocks

#### **General Audit Findings and Conclusions**

The audit confirmed that the forest management practices at Hoopa, since the initial certification, have been maintained at the standard for which they were certified. Hoopa Valley Tribe has addressed the intent if not the full requirement of most of the first year conditions assigned at the time of the initial assessment. The on-the-ground management of Hoopa demonstrates commitment, in both action and philosophy, to continual improvement and learning. The auditors recommend that Hoopa Valley Tribe retain its certified status.

#### **Status of Conditions and Corrective Action Requests (CARs)**

##### **Conditions 1,2 and 6 were fully met:**

**Condition 3:** This condition was not relevant because they had no certified sales of logs. The condition will be evaluated on an annual basis.

**Condition 4:** The fire created unforeseen delays and HTF waited seven months to get input from BIA. The summary data is in draft form and is 80% complete. The condition was therefore partially



met and work is continuing.

**CAR:** Complete the summary analysis of the CFI plot data, as per the condition, by the 2001 annual SmartWood Audit.

**Condition 5:** Hoopa Valley Tribe held a workshop taught by Chris Maser, world-renowned forest ecologist. Thirty people attended the workshops, mostly forest management staff. However, neither the Tribal Council members nor Hoopa Forest Industries (HFI) employees attended the workshop. The condition was partly met.

**CAR:** Hold another workshop on forestry and forest ecology specifically for the Tribal council and HFI employees before the next audit. Continue to work on educating tribal members and employees. Provide SmartWood auditors with information that describes the education efforts at each annual audit.

**Condition 6:** The issue of incentives and disincentives will not work unless they are aimed directly at the workers, e.g. if the worker gets a bonus for good work there will likely be changes for the better; if the logging company gets disincentives they generally do not work because it does not effect the bottom line for the tribe. HTF and HFI collaboration has improved to point where it appears to be effective in reducing operational compliance problems. Although the condition appears be essentially met, it should be revisited at the next audit to see if the current collaboration is still being effective.

**Condition 7:** Again, the fire has delayed analyzing cumulative effects work, as well as the cost of paying a person to take on the majority of this responsibility. They have completed environmental assessments within sub-basins and this will relate to the new cumulative effects work. They are looking into several sources of money to help pay for a staff person to do the work. This condition was not met.

**CAR:** Complete the cumulative effects analysis by June 1, 2001 and implement it on 2002 timber sales.

**Condition 8:** Leave trees and wildlife trees are still being cut and used for firewood. They have attempted to pull some firewood logs to the landings to encourage firewood cutters to use those. HTF staff indicated that putting signs on the leave trees only invites more problems. There is still a lack of education of the tribe in the importance of the designated leave and wildlife trees. The issue here is related to condition 5, that continuing education of tribal members about Hoopa's forest management objectives and ecological values of the forest is important.

**CAR:** See condition 5.

### SmartWood Certification Annual Addendum to the Public Summary for Hoopa Valley Tribe, 2001

#### ~~1.1.~~ 1.1 Audit Process

- A. **Audit year:** 2001
- B. **Dates of Audit:** 2/8/02
- C. **Audit Team:** Kenneth C. Baldwin is a California Registered Professional Forester (#1855) with 38 years of forestry experience, the past 30 in the forests of northern California. He has been involved in land and resource management planning, fire and fuels management planning, timber sale planning and

preparation, watershed analysis, forest inventory and design, stocking and survival surveying, reforestation, forest worker training, research, fire control, fire damage appraisals, forest recreation, forestry and environmental advocacy, and fisheries restoration. He has participated in about eight SmartWood forest certification assessments, nine audits, and one peer review in California. He has worked as an employee and/or contractor for the U.S. Forest Service, Bureau of Land Management, various Resource Conservation Districts, Hayfork Watershed Research and Training Center, Institute for Sustainable Forestry, various religious and non-profit organizations, and private landowners.

**D. Audit Overview:** In 1997 the auditor participated in a scoping and certification overview of the Hoopa Valley Tribe forestry operation, so the auditor was already familiar with this operation. Prior to the interview and field audit with Mr. Greg Blomstrom, the following documents were reviewed: the "SmartWood Forest Certification Report for Hoopa Valley Tribe" (4/15/99) and the "SmartWood Certification 2000 Annual Audit Report for Hoopa Valley Tribe" (12/20/00). On February 8, 2002, Mr. Blomstrom was interviewed and provided a tour of tribal lands, including recent modified clearcut harvesting operations. Management planning documents, including two Sample Silvicultural Prescriptions, for Hopkins Creek "K" Timber Sale, Stand 5-9-5-10-1, Unit 20" and for Pine Creek "O" Timber Sale, Stand 2-9-3-25-4 & 5, Unit 16, four sample Timber Sale Administration Agreements and/or Notices for Mill Creek "B" and Hopkins Creek "K" Timber Sales, a sample Major Amendment Notification to the Interdisciplinary Team for the Hopkins Creek "K" Timber Sale, Culture Committee Meeting Notes for (1/14/02), a list of Certified Hardwood Loads from HFI to Almquist Lumber for 2001, Hoopa Valley Tribe Timber Inventory Analysis of 3<sup>rd</sup> Measurement of Continuous Forest Inventory Plots, Greg Blomstrom & Jim Ladwig (9/29/00), Hoopa Valley Indian Reservation Watershed Wide Cumulative Effects Analysis by Greg Blomstrom (11/1/01), Training Manual and Source Materials for Storm-Proofing Forest Road Systems, Hoopa Tribal Forestry Workshop on Road Upgrading and Road Decommissioning for Improved Water Quality (4/16-19/01) prepared by Pacific Watershed Associates, Forest Management Plan Survey, Sovereign Day 2000, Tolts-coch chwlin (Supply Creek) Watershed Assessment prepared by Hoopa Tribal Forestry & Hoopa Tribal Fisheries (8/4/00), Final Environmental Assessments of Hostler Pt./Captain John CY 2001 Allowable Annual Cut Project (2/23/01) and Ranger Mtn./West Pine CY 2002 Allowable Annual Cut Project (1/4/02) prepared by HTF, HTF, & HTEPA, Decision of Hoopa Valley Tribal Council (2/14/01) to Control Black Bear Damage to Conifer Plantations on the Hoopa Valley Indian Reservation, and documentation on the process of amending the Forest Management Plan (3/27/00 to 4/17/00), were reviewed during and subsequent to the field audit.

**E. Sites Visited:** On February 8, 2002, Mr. Blomstrom was interviewed and provided a tour of recent harvesting operations on the Mill "B" Timber Sale in the north Mill Creek watershed. Due to snow the previous night that limited access above 3600 feet elevation and a slide that blocked a road, only four units were visited. These units, Mill "B" 102, 113, 161A, and 161B were all modified clearcuts. This sale and these units were checked for watercourse protections, drainage and erosion control on roads and skid trails, skid trail placement, skidding damage to soils and understory vegetation, skidding and falling damage

to residual trees, canopy closure, relative size, species mix, crown condition, position in the canopy, and overall form and health of residual trees, existence of designated wildlife and legacy trees, amount and arrangement of large woody debris, and consistency of on-the-ground activities with the objectives, standards, and guidelines outlined in the Forest Management Plan and with SmartWood principles.

**F. Personnel Interviewed:**

The following people were consulted during this audit:

<b>Person interviewed</b>	<b>Position/Organization</b>
Mr. Greg Blomstrom	Forest Planner, Hoopa Tribal Forestry
Mr. Todd Salberg	Silviculturist, Hoopa Tribal Forestry
Mr. Mark Higley	Wildlife Biologist, Hoopa Tribal Forestry
Mr. Oscar Billings	CEO, Hoopa Forest Industries

**G. Documentation reviewed:**

- Final Draft of the SmartWood Forest Certification Report for Hoopa Valley Tribe (4/15/99)
- SmartWood Certification 2000 Annual Audit Report for Hoopa Valley Tribe (12/20/00)
- Two Sample Silvicultural Prescriptions, for Hopkins Creek “K” Timber Sale, Stand 5-9-5-10-1, Unit 20” and for Pine Creek “O” Timber Sale, Stand 2-9-3-25-4 & 5, Unit 16
- Four sample Timber Sale Administration Agreements and/or Notices for Mill Creek “B” and Hopkins Creek “K” Timber Sales
- A sample Major Amendment Notification to the Interdisciplinary Team for the Hopkins Creek “K” Timber Sale
- Culture Committee Meeting Notes for (1/14/02)
- List of Certified Hardwood Loads from HFI to Almqvist Lumber
- Hoopa Valley Tribe Timber Inventory Analysis of 3<sup>rd</sup> Measurement of Continuous Forest Inventory Plots, Greg Blomstrom & Jim Ladwig (9/29/00)
- Hoopa Valley Indian Reservation Watershed Wide Cumulative Effects Analysis by Greg Blomstrom (11/1/01)
- Training Manual and Source Materials for Storm-Proofing Forest Road Systems, Hoopa Tribal Forestry Workshop on Road Upgrading and Road Decommissioning for Improved Water Quality (4/16-19/01) prepared by Pacific Watershed Associates
- Forest Management Plan Survey, Sovereign Day 2000
- Tolts-coch chwlin (Supply Creek) Watershed Assessment prepared by Hoopa Tribal Forestry & Hoopa Tribal Fisheries (8/4/00)
- Final Environmental Assessments of Hostler Pt./Captain John CY 2001 Allowable Annual Cut Project (2/23/01) and Ranger Mtn./West Pine CY 2002 Allowable Annual Cut Project (1/4/02) prepared by HTF, HTF, & HTEPA
- Environmental Assessment of Controlling Black Bear Damage to Conifer Plantations on the Hoopa Valley Indian Reservation prepared by Hoopa Tribal Forestry (1/16/01)
- Decision of Hoopa Valley Tribal Council to Control Black Bear Damage to Conifer Plantations on the Hoopa Valley Indian Reservation (2/14/01)

- Documentation on the process of amending the Forest Management Plan (3/27/00 to 4/17/00)

## 1.2 General Audit Findings and Conclusions

Judging from the Final Draft of the SmartWood Forest Certification Report for Hoopa Valley Tribe (4/15/99), the SmartWood Certification 2000 Annual Audit Report for Hoopa Valley Tribe (12/20/00), and interim management observed during this audit, Hoopa Valley Tribe appears to have maintained SmartWood quality performance standards in applied management practices.

Hoopa has met most of the conditions due by the audit date. Data has been collected from the 1996 inventory of CFI plots have been summarized, the annual allowable cut (AAC) is being adjusted, and harvest schedules are being revised to reflect these changes; a cumulative effects analysis of all 22 watersheds on the reservation has been completed and is being used by the interdisciplinary team during timber sale and annual timber program planning to determine cumulative effects of individual sales and to design sale and watershed specific mitigation measures; provisions are included in standard logging contracts that stipulate fines or disincentives for lack of compliance and; every silvicultural prescription has a section indicating what can and cannot be salvaged. No cut special management zones and riparian protection zones cannot be salvaged or entered into with machinery.

Four conditions were not required to be met until the 2002 audit, however, one of them has been met and is closed: A plan to address the bear problem on the reservation was prepared, approved, and is being implemented. The other three are in the process of being completed. It is therefore recommended that this operation remain certified.

## 1.3 Status of Conditions and Corrective Action Requests (CARs)

### Closed

**Condition 1:** Effective immediately, notify all members of the ID Team of the upcoming termination of logging operations on a particular unit and the opportunity for its review, in writing, at least two weeks prior to the removal of equipment from the unit (**Criterion 4.4**). Closed in 2000.

**Condition 2:** Effective immediately, provide copies of the silvicultural prescription to all field staff prior to commencement of on-the-ground operations to ensure they understand the prescription and contract stipulations. The Woods Boss must communicate any misunderstanding to the Timber Sale Administrator prior to initiating logging activities (**Criterion 4.6**). Closed in 2000.

**Condition 3:** Effective immediately, the FSC approved registration code assigned by SmartWood must be included in sales and shipment documentation related to certified sales (**Criterion 8.2**).

**Condition 4:** Within 1 year from the date of certification, summarize the following results from data collected from CFI plots in 1996 on a per acre basis by forest strata and adjust AAC and/or harvest schedules as necessary:

- Mean gross and net conifer/hardwood volumes and basal areas;

- Inventory statistics (# of plots, Standard Error); and Growth and mortality (**Criterion 4.3**).

**Condition 6:** Include provisions in standard logging contracts that stipulate fines or disincentives for:

- Unjustified damage to a designated leave tree as determined by Timber Sale Administrator (must be left on site, even if merchantable);
- Landing and yarding corridor deviations that have not been approved by the Timber Sale Administrator and are not in accordance with contract specifications; and lack of compliance with the written policy prohibiting logging under wet conditions (**Criteria 4.6 and 4.24**).

**Condition 8:** Initiate a program to educate Tribal members about the ecological value and necessity of the leave trees, and utilize signs or other marking options to reduce the likelihood of theft of the leave trees for firewood (**Criterion 5.21**).

**Condition 10:** Within 3 years from the date of certification, based upon analysis of results from the research project on bear damage and analysis of CFI data:

- Establish a plan to address the bear problem and treatment of young stands (including priorities, schedule and funding),
- Obtain Tribal Council approval,
- And begin implementing plan (**Criterion 4.8**).

#### **Met/Ongoing**

**Condition 7:** Within 1 year from the date of certification, cumulative effects from individual sales must be analyzed within the context of the watershed within which the sale is found, and specific mitigation actions must be designed and implemented to reduce the negative cumulative impacts from unavoidable actions associated with chosen alternatives (**Criterion 5.2**).

**Condition 9:** Within 2 years from the date of certification, establish and follow a written policy to not cut, salvage or enter into with machinery established and approved special management or riparian protection zones (**Criterion 4.20**).

#### **Partially Met**

**Condition 5:** Within 1 year from the date of certification, conduct an educational workshop in the field with silviculturists, wildlife biologists, Tribal Council members and HFI employees to explain the reasons for specific management objectives, silvicultural prescriptions, and marking guidelines (**Criterion 4.19**).

#### **Not Met**

None

#### **Corrective Action Requests**

**CAR 2001-01:** By the 2003 audit, conduct an educational workshop in the field with silviculturists, wildlife biologists, Tribal Council members and HFI employees to explain the reasons for specific management objectives, silvicultural prescriptions, and marking guidelines.